

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

LASHIFY, INC.,

Plaintiff,

v.

QINGDAO LASHBEAUTY COSMETIC CO.,  
LTD. d/b/a WORLDBEAUTY,

Defendant.

Civil No. 6:22-cv-00776-ADA-DTG

**JURY TRIAL DEMANDED**

LASHIFY, INC.,

Plaintiff,

v.

QINGDAO HOLLYREN COSMETICS CO.,  
LTD. d/b/a HOLLYREN,

Defendant.

Civil No. 6:22-cv-00777-ADA-DTG

**JURY TRIAL DEMANDED**

**JOINT MOTION TO AMEND CASE SCHEDULE AND TRIAL DATE**

Plaintiff Lashify, Inc. (“Lashify”) and defendants Qingdao Lashbeauty Cosmetic Co., Ltd. d/b/a Worldbeauty and Qingdao Hollyren Cosmetics Co., Ltd. d/b/a Hollyren (“Defendants”) jointly request that the Court amend the case schedule as set forth in the attached proposed order.

The parties respectfully submit that good cause exists for amending the schedule. The amendment will provide the parties additional time to complete necessary discovery. The parties issued discovery requests early in this case and continue to work in the hope of resolving discovery disputes without the need for the Court’s intervention. The Court also recently ordered that Defendants must produce additional witnesses for deposition (Dkt. 94). Defendants are currently

investigating mutually agreeable dates for the depositions, but do not believe that the depositions can be completed within the current fact discovery deadline, as the ten witnesses are located in China and will need to obtain travel visas and travel to Hong Kong for deposition. Defendants are also currently working to complete their ESI collection and production from China and resolve any disputes with Lashify regarding the same within the case schedule. The parties respectfully request additional time to complete their discovery efforts.

The proposed amended schedule also takes into consideration the availability of potential trial witnesses and counsel, permitting them to attend the new trial date requested in this motion.

The parties do not seek this extension for purposes of delay. As illustrated by the proposed order attached hereto, the new dates do not differ greatly from the dates in the current governing schedule.

The parties conferred, and jointly request the relief sought in this motion. Accordingly, the parties respectfully request the Court enter the proposed scheduling order attached hereto.

Dated: December 7, 2023

Respectfully submitted,

/s/ Jonathan T. McMichael

/s/ Erin C. Kolter

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Attorneys for Plaintiff  
*Lashify, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on **December 7, 2023**.

/s/ Jonathan T. McMichael

Jonathan T. McMichael